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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JUL 29 2020

**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK**

UNITED STATES OF AMERICA

v.

WILLIAM OLIVER TOWERY

§ Cause No.:

SA 20 CR 0342 XR

§ **COUNT ONE: 18 U.S.C. § 875(c)**
§ **(Interstate Communications)**
§
§
§
§

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. § 875(c)]**

On or about December 11, 2019, the Defendant,

WILLIAM OLIVER TOWERY,

did knowingly transmitted in interstate commerce from the Western District of Texas to the Eastern District of Pennsylvania, a communication, that is a text message to a presidential campaign, and the communication contained a threat to injure the presidential candidate coming to the Western District of Texas for a campaign event on or about December 13, 2019, specifically the Defendant communicated the following threat to injure: "I'll be there and have been practicing my sniping skills all month just for this occasion. If you will be nell near him you may want to wear something dark to hide the blood splatter."

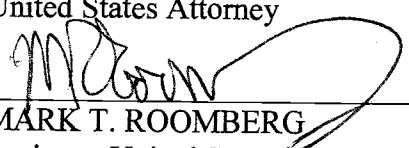
In violation of Title 18, United States Code, Sections 875(c).

A TRUE BILL.

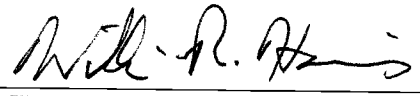

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
United States Attorney

By:


MARK T. ROOMBERG
Assistant United States Attorney

By:


WILLIAM R. HARRIS
Assistant United States Attorney